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SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON DC. 20554

REFERENCE RM 8493

The Tandy Corporation recently filed a request to delicense a portion of the General Mobile Radio Service known as the "interstitial frequencies" or the 12.5 KHz slots which are now reserved for low power use BY GMRS LICENSEES on simplex. Additionally, the request would allow unlicensed access to the "675 pair" presently used for personal communications, by most public service organizations, and for emergency and motorist assistance communications. The very fact that most public service organizations are already monitoring 675 for personal communications makes this the ideal frequency for emergency traffic, since most users are trained in handling emergency radio communications.

However, the thought of unlicensed users having unlimited access to 675 leads to chaos. Listen to ANY CB channel...that's one effect delicensing will have on the GMRS portion of the radio spectrum. Tandy employees are ALREADY claiming that no license is required for GMRS, and obviously make no effort to insure that the license application is filed with the Commission. They suggest that frequencies other than the interstitials can be ordered for insertion into the inexpensive transceivers.

Many of the members of public service organizations, including REACT, have invested a great deal of time, effort, and finance into insuring that the GMRS networks are well organized and self policing. The Commission, due to the financial constraints imposed by the federal budget, is normally unable to assist with problems until all channels within the local area are exhausted. We, as users, try to understand the problems of the Commission and assist as much as possible with solving problems on the various repeater systems. Why would the Commission even consider a request that is fraught with problems by the very nature of the request.

In 1987, the Commission took steps with PR Docket 86-38 to eliminate the commercial users from the GMRS frequencies. The current Tandy proposal would allow the commercial users to again control this portion of the spectrum. Additionally, while the commercial users might initially use the low power handheld units sold by Tandy, the high powered mobiles would soon be in use on the primary frequencies. Tandy's response? "It's not our fault! We sold the low power units in good faith!" Should the Commission undo the intent of the 1987 ruling by creating this unlicensed service accessible to commercial users? This very real possibility would defeat the concept of the "Family Radio Service" by making it impossible for the families to use the radios because of interference.

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The request by Tandy also includes a review of the access modes of the various repeaters on the 675 pair. Obviously, Tandy would like every repeater to be carrier accessed, rather than accessed by sub-audible tone. The GMRS handheld presently marketed by Tandy is not capable of transmitting the codes required to access repeaters. It would be in the interests of Tandy to have all repeaters on 675 be carrier accessed. Unfortunately, in many cases, the repeaters themselves would interfere with each other, and make all communications impossible.

Additionally, each GMRS repeater owner/operator/licensee must control the station, and must insure that all repeater users follow the FCC rules. The lack of licensing would make the task virtually impossible. If the unlicensed FRS operator is permitted access to the 675 pair for emergency use, he would automatically assume permission to use the pair for general communications, after hearing other users WHO ARE LICENSED and have the necessary permissions, on the frequency.

At a recent "hamfest", while monitoring the 675 simplex frequency, I listened to two young men discussing their Radio Shack handheld transceivers. They were challenged by someone else for their language, and replied, "-----, this is CB radio! We don't need a license." If this is the type of communications that Tandy Corporations is advocating, the sales will be rather short lived. As in CB radio, many will purchase at first, but as the word is spread about the language and interference problems that will inevitably arise, customers will quit buying.

Mixing licensed and unlicensed users on the same frequencies has proven unworkable and unmanageable. That mistake should not be repeated. There are simply too many public service organizations using the GMRS systems to save lives; there are many, many individuals using GMRS for personal communications; and there is too much assistance being given to the communities by GMRS users to allow this concept to proceed further.

RM-8493 should be rejected in its entirety.

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